

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

August 20, 2021

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees write regarding the deposition of Wa'el Jelaidan, noticed to commence at 7 a.m. (EDT) next Thursday, August 26, 2021. The PECs respectfully request that the Court direct that, by noon (EDT) on Tuesday, August 24, 2021, Mr. Jelaidan provide to the undersigned representatives of the PECs contact information and an affirmative representation that he will appear for his deposition as noticed, or he will be presumed to have failed to appear.

Because Mr. Jelaidan is now proceeding pro se, and no response has been received from communications sent to him, the PECs have no reliable way to communicate with Mr. Jelaidan. But the manner in which remotely conducted depositions have been proceeding in this multidistrict litigation necessitate that the retained court reporting agency provide the witness (ordinarily through the witness's counsel) with information about how to join the deposition remotely.

In addition, because the remotely-conducted deposition will require that the PECs schedule to have a court reporter, two technicians, and a translator ready for the deposition on Thursday at 7 am, we are asking for some indication that the witness will make himself available. Or, to the extent that, by noon (EDT) on Tuesday, August 24, 2021, Mr. Jelaidan does not provide contact information and an affirmative representation that he will appear at that time for his deposition, he will be presumed to have failed to appear.

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

The Honorable Sarah Netburn  
August 20, 2021  
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cc: The Honorable George B. Daniels, via ECF  
All Counsel of Record via ECF